



November 17, 2022

San Diego City Council  
202 "C" Street  
San Diego, CA 92101

**RE: Climate Action Plan Implementation Prioritization**

Honorable Mayor and Councilmembers,

Climate Action Campaign is a non-profit organization based in San Diego with one mission: stop the climate crisis through effective and equitable policy action. We believe that all San Diegans deserve clean air and water, shade trees, safe streets, mobility options, and affordable housing.

The City's Climate Action Plan (CAP) Update includes a commitment to a zero-emissions target by 2035. This is consistent with climate science and state law, and if implemented, will help protect public health while also making our communities safe and ready to confront the impacts of the climate crisis. Unfortunately, the City has given the community ample reason to be worried that this plan will not be fully implemented. Below we outline our key concerns and recommendations.

**Implementation Failures: CPUs and Master Mobility Plan**

In 2015, San Diego adopted a groundbreaking CAP and was highlighted as a global leader for the commitments that were signaled in that plan. However, our research shows that since 2015, 90% of the strategies in that plan have gone unimplemented, or lack publicly available information on their progress. We have repeatedly pointed to the fact that the City's actions are not consistent with actually meeting the goals outlined in the CAP.

Even today, the City continues to propose actions that are in direct opposition to strategies in the CAP. As an example, none of the current draft Community Plan Updates (CPUs) in Mira Mesa, University City, and College Area have mode shift targets that are consistent with the CAP. The City is continuing its long practice of adopting CPUs that do not accord with CAP modeshift goals, claiming that density can be made up in other parts of the City.

In addition to these CPU failures, the City continues to refuse to provide a timeline for the completion of the Master Mobility Plan, as well as details about what the plan will include. As of now, the plan is set to be completed in 2024, nearly a decade after the adoption of the City's 2015 CAP mode shift targets.

These kinds of inconsistencies degrade public trust in our government. Earlier this year, the City convened a CAP Update Advisory Committee, asking stakeholders to offer guidance on the CAP update process. During these meetings, committee members repeatedly requested that an implementation plan be adopted concurrently with the CAP, however, City staff refused to

include this language in the committee's official recommendation documents, and the 2022 CAP Update was adopted without an implementation plan.

### **Comments on IBA's Prioritization Policy**

We appreciate that the Council has asked the Independent Budget Analyst (IBA) to draft a Prioritization Policy to show which strategies and actions in the CAP should be prioritized during the implementation process. It is our understanding that this Prioritization Policy will be informed by the council offices and community input, as well as the City's Implementation Matrix. The Matrix includes measurable outcome categories for each strategy and action, such as GHG reduction, air quality, public health, equity impacts, feasibility, etc. It is critical that these categories are not used as an excuse to postpone action on any of the strategies and actions within the CAP.

The true prioritization occurred during the CAP Update drafting process, which should have included the completion of an implementation plan. Since the City intentionally delayed this process, prioritization should continue while completing the CAP implementation plan.

There is nothing in the CAP that is not crucial to addressing our climate and public health crises. Our concern is that the process of developing a Prioritization Policy based on the categories in the Implementation Matrix could lead to the implication that some portions of the CAP can be deprioritized, which is exactly the opposite of what the community needs and expects from its elected leaders.

We do understand that once an appropriately detailed implementation plan has been completed, there may be times that the Council will need to make difficult decisions about funding specific actions in a given year. The goal of this new Prioritization Policy should be to make this decision transparent and clear. To that end, we recommend that GHG reduction be considered as the most important category in guiding this decision. GHG reduction is an indicator that also carries with it equitable implementation, improved air quality, public health, and resilience. Prioritizing GHG reductions will result in these other elements. Jobs, feasibility, and funding are also critically important, and must be built into the development of the implementation plan itself to ensure that no future prioritization decisions reduce the efficacy of these factors.

### **Recommendations for Immediate Action**

When prioritizing timing for implementation, it is important to note that some strategies in the CAP will require a lot of time and resources to accomplish, and should therefore be started as soon as possible. Two examples of this are the decarbonization of the built environment in Strategy 1 and transportation mode shift goals outlined in Strategy 3. These strategies yield the greatest GHG reduction potential by far, as is identified in the [IBA Report - 22-19](#). The only way to reach the objectives within these strategies is to complete a detailed implementation plan with costs and funding opportunities identified. There are a mere 12 years between now and the 2035 goal of electrifying 90% of buildings in the City of San Diego and shifting to 25% walking and 10% cycling for all trips made by San Diego residents - a massive shift in how we get around.

We also know that there are elements within the CAP that can be completed within the next year, and won't require a lot of outside funding. These items should be prioritized in the implementation plan for immediate completion so that the benefits can be realized as soon as

possible. This will enable the City to move past them and focus resources on the longer term, more difficult strategies.

One example of an action that can be immediately taken is making Blueprint SD mandatory for all Community Plan Updates, requiring them to be consistent with the mode shift and density targets in the CAP. This is an administrative policy decision that could happen quickly, and have huge ramifications in terms of GHG reduction, air quality improvement, and increased equity. It is remarkably feasible, and it would have the co-benefit of helping address our region's housing affordability crisis. Additional examples of potentially fast actions include the completion and implementation of the Master Mobility Plan, the Bike Master Plan, the Park Master Plan, the San Diego River Park Master Plan, and the adoption of an all-electric ordinance for new construction or "reach code," requiring all new developments to be fully electric.

Once again, the prioritization of strategies and actions in the CAP should be outlined by the development and adoption of a detailed implementation plan with costs, clearly defined benchmarks, and regular, detailed reporting on the milestones showing progress towards the identified goals. All strategies are priorities, and all of them must be funded and implemented to ensure our communities receive the benefits of the CAP.

### **Conclusion**

To comply with state law, and ensure the implementation of the CAP, we urge the City to commit to the full completion of the implementation plan no later than February, 2023. This plan must clearly identify benchmarks for progress towards the GHG reduction goals, and require regular public reporting on the progress on an at-minimum annual basis. Once the planning is complete, the City must move to full "implementation mode" by deploying all resources necessary to carry out all of the multiple actions within the CAP.

Finally, in its current state, without an implementation plan, this CAP is unfundable. It lacks the specificity required for federal and state grants. Our hope is that the City of San Diego will be ready to demonstrate existing plans for specific projects and programs, as well as strategies for allocating expected funding as federal and state grants become available.

The health and safety of San Diegans depends on these priorities being taken seriously, and on our leaders acting quickly to implement these plans.

Sincerely,

A handwritten signature in black ink, appearing to read "Mikey Knab". The signature is fluid and cursive, with a long horizontal stroke at the beginning and a large loop at the end.

Mikey Knab  
Director of Policy  
Climate Action Campaign